

CLIENT ALERT

Annual CFTC and NFA Regulatory Reminders

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AUTHORS

Gabriel Acri | Rita M. Molesworth | Deborah A. Tuchman

The Annual CPO and CTA Affirmation Window Is Open

The CFTC requires each entity or person claiming an exemption from CPO registration under CFTC Rule 4.13(a)(1), 4.13(a)(2), 4.13(a)(3) or 4.13(a)(5), an exclusion from CPO registration under CFTC Rule 4.5, or an exemption from CTA registration under CFTC Rule 4.14(a)(8), to affirm, on an annual basis, whether such exemption or exclusion is, or remains, applicable.

Affirmation filings are due within 60 days after the calendar year end.¹ For this affirmation cycle, the deadline to reaffirm an exemption filing is March 2, 2026.

Persons reaffirming an exemption filing pursuant to CFTC Rule 4.13(a)(1), 4.13(a)(2), 4.13(a)(3) or 4.13(a)(5) must also attest that neither such person, nor any principal, is statutorily disqualified per Section 8a(2) of the Commodity Exchange Act.

¹ <https://www.nfa.futures.org/newsnotices/newsArticle.aspx?MT=&Topic=&AllYrs=&Year=2025&ArticleID=5772>.

The affirmation must be filed through NFA's website, via NFA's Exemptions System, accessible through NFA's Electronic Filing Systems page.²

If you have any questions regarding this client alert, please contact one of the authors, any member of our CFTC team listed below, or the Willkie attorney with whom you regularly work.

Willkie has a dedicated team of attorneys with extensive knowledge and experience in all aspects of the Commodity Exchange Act and the CFTC regulatory regime. We would be pleased to assist on your matters.

Gabriel Acri

212 728 8802
gacri@willkie.com

Tamika P. Bent

212 728 3935
tbent@willkie.com

J. Christopher Giancarlo

212 728 3816
jcgiancarlo@willkie.com

Kari S. Larsen

212 728 3297
klarsen@willkie.com

Steven C. Matos

212 728 8757
smatos@willkie.com

Rita M. Molesworth

212 728 8727
rmolesworth@willkie.com

Chelsea Pizzola

202 303 1092
cpizzola@willkie.com

Deborah A. Tuchman

212 728 8491
dtuchman@willkie.com

Leanne Aban

212 728 8168
laban@willkie.com

Kelley Merwin

202 303 1178
kmerwin@willkie.com

Jenna Fattah

212 728 3066
jfattah@willkie.com

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BRUSSELS CHICAGO DALLAS FRANKFURT HAMBURG HOUSTON LONDON LOS ANGELES
MILAN MUNICH NEW YORK PALO ALTO PARIS ROME SAN FRANCISCO WASHINGTON

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² <https://www.nfa.futures.org/electronic-filing-systems/exemptions.html>.